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May 8, 1996
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(With original signatures)

EX PARTE

Ms. Regina Keeney
Chief, Common Carrier Bureau
Federal Communications Commission
1919 M Street, NW, Room 500
Washington, D.C. 20554

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MAY - 9 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: Telephone Number Portability, CC Docket No. 95-116

Dear Ms. Keeney,

The undersigned parties -- all participants in the Illinois Local Number Portability ("LNP") workshop process -- wish to take this opportunity to encourage the Commission to adopt the Location Routing Number ("LRN") solution as the nationwide, long term number portability architecture. We believe this will most efficiently and expeditiously meet the requirements of the Telecommunications Act of 1996 ("the Act") to implement number portability for local exchange customers.

Despite the suggestions of other carriers¹, LRN *has* achieved acceptance throughout the industry as the best solution to implement permanent provider portability. The Illinois workshop, like other state commission-sponsored LNP industry efforts, includes a cross section of national and local industry participants -- LECs, CLECs, interexchange carriers and cellular carriers.² Support for LRN has by no means been confined to Illinois, or to Ameritech among the RBOCs. Similar industry groups across the country -- including in New York, Maryland, Georgia, Washington and Colorado -- have conducted extensive reviews of available alternatives and likewise voted LRN as the best solution.

The Illinois workshop applied stringent policy criteria to its selection of a permanent LNP

¹E.g., Pacific Bell presentation and letter to the Common Carrier Bureau on April 11, 1996, in CC Docket 95-116.

²The Illinois workshop participants include Ameritech, AT&T, GTE, Cellular One, MCI and MCImetro, Sprint Communications Company, L.P., Central Telephone Co. of Illinois, Time Warner, TCG, MFS, the Illinois Commerce Commission Staff, and others.

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architecture, and LRN met or exceeded all of them. The criteria were: 1) national compatability; 2) expandable to accommodate location and service portability; 3) causes no change in how end users originate or terminate calls; 4) all participating providers can deploy the same architecture; 5) does not require routing of traffic through the incumbent LEC networks; 6) accommodates access to number portability databases at multiple locations within networks; 7) administration is performed by a neutral third-party; 8) causes no degradation of service or loss of functionality; 9) consistency with existing network infrastructure and standards; 10) conserves numbers and codes; 11) not proprietary to any single manufacturer; and 12) supports 911/E911. The undersigned parties believe these criteria are essential to any number portability architecture, whether selected for Illinois or anywhere else in the nation. Since LRN meets all of the above architecture criteria, it is an ideal number portability template for all jurisdictions.

Following its review of alternatives and selection of LRN, the Illinois industry workshop participants obtained commitments from all major switch manufacturers to deliver LRN software during second quarter 1997.³ A Stipulation and Agreement to deploy the LRN architecture in MSA-1 (the Chicago area) was signed by most of the workshop participants and approved by the Illinois Commerce Commission ("ICC").⁴ In addition, the participants completed requirements for a neutral third-party database administration system, issued a Request For Proposal ("RFP"), and recently selected a vendor to administer the LNP database (thus meeting the Act's requirement for third-party database administration). Finally, the participants continue to make progress on all related areas of LNP implementation, including operational support systems ("OSS"), rating and billing, network operations, and operator services issues. Significantly, after considerable review to date, no participant has identified any problems in these related implementation areas that would alter target implementation dates.

The undersigned parties believe the open, industry consensus-driven efforts in Illinois and elsewhere have been extremely successful in identifying a robust, nondiscriminatory, and efficient method of implementing LNP in the earliest time frame possible. However, the parties are concerned that proposals by other carriers to permit alternate solutions will delay the deployment of LNP. Specifically, one alternative to the basic LRN architecture, Query On Release ("QOR") proposed by Pacific Bell, is still under development and will not be universally available at the time of Illinois' second quarter 1997 target implementation date. QOR has not been subjected to any of the extensive examination, refinement, and generic and application software development that has been completed for LRN. Additionally, the merits of deploying this alternative are still being debated. If the industry (and especially switch vendors) were

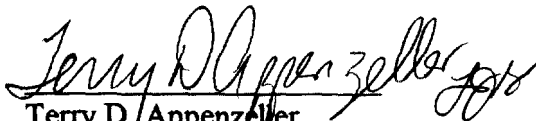
³Although it can provide tandem and end office LRN software by second quarter 1997, Ericsson has recently indicated to MFS that its SSP modifications will not be available until third quarter 1997.

⁴The Stipulation and Agreement was signed by Ameritech, AT&T, Cellular One, MCI and MCImetro, Sprint Communications Company, L.P., Central Telephone Co. of Illinois, Teleport, and MFS.

required to wait or start over at this point to accommodate QOR development, or development of any solution other than LRN in their initial software releases, LNP deployment would be significantly delayed. The undersigned parties are especially concerned that the second quarter 1997 LRN availability dates provided by switch vendors will be put in jeopardy if the vendors are diverted from the primary goal of developing software for the permanent LNP solution in order to simultaneously pursue development of interim routing schemes such as QOR.

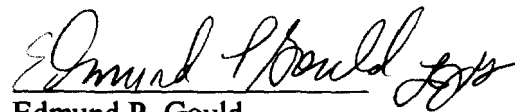
The undersigned parties believe the Commission should immediately adopt LRN as the nationwide, long-term LNP architecture. The record in this docket and in the numerous state workshop processes demonstrate that LRN is clearly the number portability solution that can most effectively, efficiently and rapidly promote local exchange competition, in fulfillment of the Act's requirements.

Sincerely,


Terry D. Appenzeller
Vice President - Open Market Strategy
Ameritech


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Senior Manager - Number Resource
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MFS Intelenet of Illinois, Inc.

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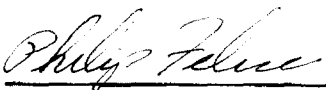
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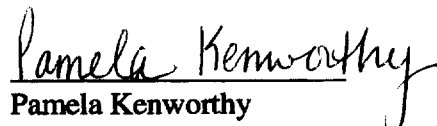
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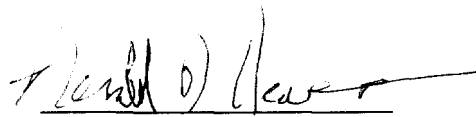
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